

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AMINI INNOVATION CORPORATION, a	)	
California corporation,	)	
	)	
Plaintiff,	)	Civil Action No. 08 C 1651
	)	
v.	)	Judge Suzanne B. Conlon
	)	
D.A. INTERNATIONAL, INC., an Illinois	)	Magistrate Judge Valdez
Corporation, RAAD ALTEMIMEI, an individual,	)	
	)	
Defendants.	)	

**DEFENDANTS' AGREED MOTION FOR SECOND EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD TO THE COMPLAINT**

Defendants, D.A. International, Inc. and Raad Altemimeei (collectively, the "Defendants"), by and through their undersigned counsel, hereby move this Honorable Court for an Order extending the time by fourteen (14) days -- that is, until May 14, 2008 -- for Defendants to answer or otherwise plead to the Complaint. Defendants were served with the Complaint and Summons on March 23, 2008. In view of the parties' efforts directed to resolution of this matter, Defendants filed on April 10, 2008, an Agreed Motion for an Extension of Time to Answer or Otherwise Plead. The Agreed Motion was granted on April 15, and allowed the Defendants until April 30, 2008 to respond to the Complaint.

A further extension is needed because the parties believe they have settled the case and are presently exchanging executed settlement documents. Counsel for Defendants has conferred with the Plaintiff's counsel, and Plaintiff does not oppose Defendants' request for an extension of time.

In view of the foregoing, Defendants respectfully request that the date to answer or otherwise

plead to the Complaint be extended by fourteen (14) days, until May 14, 2008. Further, on behalf of the parties, Defendants state that this motion and the requested extension of time are not interposed for purposes of delay.

WHEREFORE, Defendants request entry of an order in accordance with the prayer of this Agreed Motion.

Respectfully submitted,

D.A. INTERNATIONAL, INC. and  
RAAD ALTEMIMEI

Dated: April 30, 2008

By: s/Roger H. Stein  
Roger H. Stein  
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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 30<sup>th</sup> day of April, 2008, a true and correct copy of the foregoing **DEFENDANTS' AGREED MOTION FOR SECOND EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO THE COMPLAINT** was filed electronically with the Clerk of the Court using the Court's CM/ECF System, which will provide electronic notification of such filing to the following counsel for Plaintiff:

Jeffrey R. Gargano  
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and via facsimile, with confirmation via first-class U.S. mail, postage prepaid, to the following non-ECF registered counsel for Plaintiff:

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s/Roger H. Stein  
One of Defendants' Attorneys

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